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## FINDING AND RECOMMENDATION(S)

**Submitted by:** The Lahontan Water Board and TRPA ~~The Permit Streamlining Working Group~~

### **Finding: Reduce or Eliminate Permitting for Hand Crew work outside Urban Areas in California**

All agencies support use of hand thinning crews as a 'light on the land' approach to reduce fuel loads. Currently, fuel reduction projects outside the urban environment involving hand crews must obtain some form of authorization from TRPA and Lahontan.

#### **Background:**

As an example, TRPA in its MOU with California Tahoe Conservancy (CTC) requires the CTC to submit a project description for these types of projects under the "Qualified Exempt" category. For Lahontan, hand crew work for fuel reduction projects must submit an application and map under Category 1c of the Timber Waiver. Both agencies are willing to support moving hand thinning operations into a no notification status under their existing regulatory programs, except for those projects involving more than 1 acre of hand thinning within a stream environment zone. According to TRPA and Lahontan, these projects because of their location in sensitive wildlife habitats and their proximity to streams and waterbodies, pose increased risks to fish, wildlife, vegetation, soils and water quality. Potential impacts include soil compaction and disturbance causing erosion and transport of sediment along preferential pathways to streams, loss of woody debris in stream zones, loss of wildlife habitat, and damage to remaining riparian vegetation.

TRPA and Lahontan anticipate that the information coming annually from the newly established Interagency Project Implementation Team will satisfy the need for a project application and project information for these types of projects.

#### **Recommendation No. 1:**

**(Not supported by CALFIRE or LTBMU. See alternative recommendation from CALFIRE, Tracking # V-023, which is also supported by LTBMU).**

**(Supported by Lahontan and TRPA — see alternative recommendation from Mary Huggins, CALFIRE).**

The Commission recommends that the TRPA and Lahontan Water Board eliminate and/or reduce project submittals for hand thinning operations. For hand thinning operations of any size with less than 1 acre of SEZ, the Commission recommends the Lahontan Water Board consider these projects in Category 1a of its Timber Waiver and the TRPA consider these projects Exempt from permitting, eliminating the need for notification to Lahontan and TRPA to conduct fuel reduction projects where no potential impact to water

quality exists. For hand thinning projects in SEZs over 1 acre in size, outside the urban areas, the Commission recommends the Lahontan Water Board and TRPA continue to allow these projects to proceed under qualified exempt category for TRPA and category 1c of the Lahontan Timber Waiver, by allowing a single permit application, general description and map be submitted to both TRPA and Lahontan. The annual workplan from the Tahoe Interagency Planning and Implementation Team would suffice as the permit application submittal.

### **Impacts of Implementation:**

REQUIRED analysis of impacts on the following factors:

- ☐ Cost – reduces landowner costs by eliminating the need for permit applications. Cost to amend existing MOUs, permits and waivers.
- ☐ Funding source – existing staffing at TRPA and Lahontan
- ☐ Staffing – requires Lahontan and TRPA staff to amend existing MOUs and permits or waivers, and present to Boards for consideration at public hearings. In the long term reduces staffing needed to submit permit applications.
- ☐ Existing regulations and/or laws – No changes needed.

OPTIONAL analysis of impacts:

- ☐ Operational – eases permitting burden
- ☐ Social – none
- ☐ Political – positive political demonstration of streamlining by public agencies.
- ☐ Policy - none
- ☐ Health and Safety – assists landowners in meeting fuel reduction objectives.
- ☐ Environmental – Environmental analyses will be required to amend MOUs and modify timber waiver. No significant adverse environmental impacts anticipated.
- ☐ Interagency – Improves coordination between project proponents and TRPA and Lahontan. Provides for a single permit application.